

# UNITED STATES DISTRICT COURT

for the  
Eastern District of Missouri

FILED

JUL 17 2019

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

In the Matter of the Search of )  
Priority Mail package )  
9505513408829196288513, addressed to "Erica ) Case No. 4:19 MJ 330 DDN  
Jones 756 N. 72 ND. ST E Saint LOUIS Il 62203," )  
with a return address of "Jessy Sainz 3332 N. )  
Romero RD Unit 36 Tucson AZ. 85705." )  
)

## APPLICATION FOR A SEARCH WARRANT

I, Anne Kriedt, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

Priority Mail package 9505513408829196288513, addressed to "Erica Jones 756 N. 72 ND. ST E Saint LOUIS Il 62203," with a return address of "Jessy Sainz 3332 N. Romero RD Unit 36 Tucson AZ. 85705." located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States currency

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

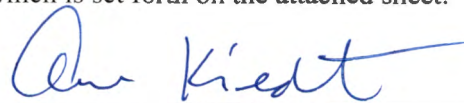
Title 21, U.S.C., §§ 846, 841(a)(1)

Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

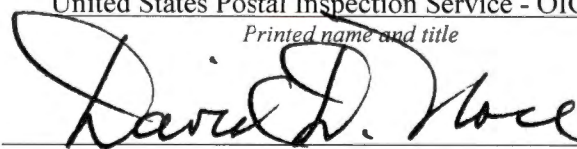
ANNE KRIEDT, Special Agent  
United States Postal Inspection Service - OIG

Printed name and title

Sworn to before me and signed in my presence.

Date: July 17, 2019

City and State: St. Louis, MO



Judge's signature

Honorable David D. Noce, U.S. Magistrate Judge

Printed name and title

AUSA: Jeannette S. Graviss

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AFFIDAVIT

I, Anne Kriedt, being duly sworn, state the following:

1. I am a Special Agent with the United States Postal Service - Office of Inspector General (USPS-OIG) and am currently assigned to the United States Postal Inspection Service (USPIS). I have been employed as an USPS-OIG agent since October 2018 and prior to that I was a Postal Inspector with the USPIS since February 2006. I am currently assigned to the Multi-Functional Team and am responsible for the investigation of narcotic and money laundering investigations. I have received training by the USPIS, and members of the USPIS, in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's Multi-Functional Team has intercepted numerous parcels, which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. Prior to my employment with the USPIS, I was employed as a Special Agent with the Immigration and Customs Enforcement (ICE) from 2001 to 2006. Prior to working for ICE, I was employed as a Police Officer with the Clayton Police Department, St. Louis County, Missouri from 1996 to 2001. I have experience and advanced training pertaining to drug related investigations from the USPS-OIG, USPIS, ICE, St. Louis County Police Academy, as well as various other federal agencies and organizations.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent,

business-to-business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail is seldom used for individual to individual correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of and destinations for controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are



usually from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

5. Most business mailings sent via USPS or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet) the USPIS learned that unknown persons posted intelligence on the Silk Road website warning would be drug mailers that most USPIS search warrant affidavits for narcotics/narcotics proceeds packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or

addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph.

6. The U.S. Postal Inspection Service St. Louis Field Office's Multi-Functional Team has found the characteristics listed in paragraphs three, four, and five, are indicative of packages, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.

7. On Wednesday, July 17, 2019, Postal Inspectors were performing a review of Priority Mail packages at the Network Distribution Center (NDC), located in Hazelwood, MO. Subsequent to their review, Priority Mail package **9505513408829196288513** (hereafter "**Subject Package**") was located. The **Subject Package** was mailed on July 15, 2019 from the Tucson, AZ Post Office (Zip code: 85705). The **Subject Package** was addressed person-to-person, bore a hand-written mailing label, and was originating from a known source narcotics area: Tucson, AZ. The characteristics listed in this paragraph are consistent with characteristics of previous packages that have contained narcotics or proceeds of narcotics.

8. The **Subject Package** was addressed to "Erica Jones 756 N. 72 ND. ST E Saint LOUIS IL 62203" with a return address of "Jessy Sainz 3332 N. Romero RD Unit 36 Tucson AZ. 85705" A review of available USPS databases revealed that the sender address of 3332 N. Romero Road, Unit 36 in Tucson, AZ did not exist. In the past, narcotics traffickers have utilized fictitious

sender addresses on mailing labels in an attempt to avoid law enforcement detection. A review of USPS databases indicated “Erica Jones” was not a name associated with the address of 756 N. 72<sup>nd</sup> Street, East St. Louis, IL 62203. In the past, narcotics traffickers have utilized fictitious addressee names on mailings labels in an attempt to avoid law enforcement detection. Due to the characteristics associated with the **Subject Package** (hand-written mailing label, addressed person-to-person, originating from a source narcotics city, fictitious sender address/addressee name, etc.); a K-9 review was requested.

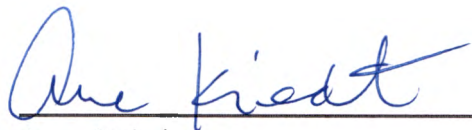
9. On Wednesday, July 17, 2019, at approximately 9:00 AM, Postal Inspectors contacted Detective David Sebek, a K9 Detective employed by the St. Louis County Police Department. Detective Sebek responded to the USPIS St. Louis Field Office for a K9 review. Detective Sebek was accompanied by his narcotic trained canine “Pippi.” The **Subject Package** was placed in an area not known to have been previously contaminated by a narcotic odor. Detective Sebek had “Pippi” search this area. Upon arriving at the **Subject Package**, Detective Sebek advised that canine “Pippi” reacted in a positive manner, indicating the presence of a narcotic odor.

10. The **Subject Package** is a brown, cardboard box with a Priority Mail Label. The **Subject Package** measures approximately twelve (12) inches, by ten (10) inches, by three (8) inches, and weighs approximately four (4) pounds, thirteen point seventy (13.70) ounces. Available USPS business records indicated the mailer utilized cash to pay for the postage fee of \$18.70, a payment method that is consistent with previously seized narcotics packages. Based on my training and experience, as well as the training and experience of other members of the USPIS Saint Louis Narcotics Team, I know that the size and weight of the **Subject Package**, coupled with other indicators (hand-written label, addressed person-to-person, originating from a source

narcotics city, fictitious sender address/addressee name, cash payment for postage, and a positive reaction by a narcotic trained canine), are indicative of other packages which have been found in the past to contain narcotic substances, or monies which are the proceeds/payments of narcotic trafficking. It is my belief that the package will contain narcotics, a violation of Title 21, United States Code, Sections 841(a)(1) and 846. Upon execution of the search warrant, I will provide the court with documentation of my findings.

11. The **Subject Package** is currently in the custody of Special Agent Anne Kriedt in the Eastern District of Missouri. Attached herewith is a picture of the mailing label for Priority Mail 9505513408829196288513 package and a copy of the qualifications for Officer Sebek's K-9 "Pippi."

12. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.



Anne Kriedt  
USPS-OIG Special Agent

SUBSCRIBED and SWORN to before me this 17<sup>th</sup> day of July, 2019.



DAVID D. NOCE  
United States Magistrate Judge  
Eastern District of Missouri



**PRIORITY<sup>®</sup>**  
**★ MAIL ★**



VISIT US AT [USPS.COM](https://usps.com)<sup>®</sup>  
ORDER FREE SUPPLIES ONLINE

FROM:

Jessy Sainz  
3332 N. Romero RD. unit 36  
Tucson AZ.  
85705

**TO:** Erica Jones

756 N. 72ND ST  
E SAINT LOUIS IL  
62203

Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL USE



**Retail**

**P**

US POSTAGE PAID

**\$18.70**

Origin: 85705  
07/15/19  
0388960734-19

**PRIORITY MAIL 2-Day<sup>®</sup>**

4 Lb 13.70 Oz

**1004**

EXPECTED DELIVERY DAY: 07/17/19

**C043**

SHIP  
TO:

756 N 72ND ST  
EAST SAINT LOUIS IL 62203-1624

**USPS TRACKING NUMBER**



**9505 5134 0882 9196 2885 13**



**St. Louis County Police Department**  
Division of Criminal Investigations Canine Detective  
Canine Probable Cause Affidavit of Qualifications  
Handler: Detective David Sebek, DSN 3341  
Canine "Pippi" DSN 46

I, Detective David Sebek, DSN 3341, have been a Commissioned Police Officer of the St. Louis County Police Department since January 5, 2001. I have completed 200 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Pippi" and I are currently assigned to the St. Louis County Police Department's Division of Criminal Investigation's Drug Enforcement Unit.

Canine Pippi is a black and white colored, female, German Shorthair Pointer. She was born on February 8, 2013. Canine Pippi and I attended and completed the "Basic Police Canine Training Course for Narcotics Detection", from October 3, 2015, through October 30, 2015. This course was held at Shallow Creek Kennels, located in Sharpsville, PA. The training course consisted of four weeks of instruction and application of canine obedience, narcotics/controlled substance detection. Canine Pippi and I were certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on October 30, 2015.

Canine Pippi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, and Marijuana. Canine Pippi alerts to these odors in a passive manner by sitting at, or as close as she can get, to the source of the odor.

Canine Pippi and I were last annually re-certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on April 29, 2019.

Since Canine Pippi and I began working, she had been responsible for the seizure of approximately 1,495 lbs of marijuana, approximately 6.75 lbs of heroin, 159.5 lbs of methamphetamine, and 31 lbs of cocaine. Canine Pippi has also been responsible for the seizure of approximately \$2,291,679 in smuggled bulk US currency.

Canine Pippi and I train a minimum of four hours per week, in the areas of narcotic detection with the St. Louis County Police Department's Canine Unit and on our own time.

This affidavit is current as of July 8, 2019.

Detective David Sebek, DSN 3341  
St. Louis County Police Department  
Division of Criminal Investigations, Drug Enforcement Unit  
7900 Forsyth Blvd  
Clayton, MO 63105  
(636) 529-8225